



ADMINISTRATION FOR CHILDREN & FAMILIES

Office of Head Start | 4th floor Switzer Memorial Building, 330 C Street SW, Washington DC | eclkc.ohs.acf.hhs.gov

To: Board Chairperson

Mr. Michael Johnson
Board Chairperson
Community Action Organization of
Erie County, Inc.
45 Jewett Avenue
Buffalo, NY 14214-2401

From: Responsible HHS Official

Date

Dr. Deborah Bergeron
Director, Office of Head Start

Overview of Findings

On 2/6/19, the Administration for Children and Families (ACF) conducted a monitoring review of the Community Action Organization of Erie County, Inc. Head Start and Early Head Start programs to determine whether the previously identified findings had been corrected. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review. This Head Start Review Report has been issued to Mr. Michael Johnson, Board Chairperson, as legal notice to your agency of the results of the program review.

Based on the information gathered during our review, we have closed the previously identified findings. Accordingly, no corrective action is required at this time. If you have questions about this report, please contact your ACF Regional Office.

Distribution of the Head Start Review Report

Copies of this report will be distributed to the following recipients:

Ms. Carolyn Baker, Regional Program Manager
Ms. Adrianne Adger, Policy Council Chairperson
Mr. L. Nathan Hare, CEO/Executive Director
Ms. Phyllis McBride, Head Start Director (02CH010329, 02CH10048)
Ms. Diane Semrau, Early Head Start Director (02CH010329, 02CH10048)
Ms. Kelly Fanara, Early Head Start Director (02HP0020)

Overview Information

Review Type:	<i>Desk/FTL Solo</i>
Organization:	<i>Community Action Organization of Erie County, Inc.</i>
Program Type:	<i>Head Start and Early Head Start</i>
Field Lead:	<i>Ms. Vanessa Nelson-Eastmond</i>
Funded Enrollment HS:	<i>2,183</i>
Funded Enrollment EHS:	<i>535</i>

Glossary

A glossary of terms has been included to explain the various terms used throughout this report.

Term	Definition
Compliance Measure (CM)	The specific statements that collectively assess the level of program performance for each Key Indicator, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong management systems.
Strength	A new and/or unique way of reaching the community.
Compliant	No findings. Meets requirements of Compliance Measure.
Concern	An area or areas of performance which need improvement or technical assistance. These items should be discussed with the Regional Office and do not include a timeframe for correction.
Noncompliance	A finding that indicates the agency is out of compliance with Federal requirements (including, but not limited to, the Head Start Act or one or more of the performance standards) in an area or areas of program performance, but does not constitute a deficiency. Noncompliances require a written timeline of correction and possible technical assistance (TA) or guidance from their program specialist, and if not corrected within the specified timeline, can become a deficiency.
Deficiency	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"> (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or (vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified; <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>

Summary of Findings

Finding Type	Applicable Standards	Program Type	Grant	Timeframe	Status
<i>Staff hiring, supervision, and development</i>	1302.91(e)(1)(2)(ii)	HS/EHS	02CH010329 02CH10048 02HP0020	N/A	Corrected

Status of Previously Identified Area of Noncompliance

Finding	Status
<p>1302.91 Staff qualifications and competency requirements. (e) Child and family services staff. (1) Early Head Start center-based teacher qualification requirements. As prescribed in section 645A(h) of the Act a program must ensure center-based teachers that provide direct services to infants and toddlers in Early Head Start centers have a minimum of a Child Development Associate (CDA) credential or comparable credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development. (2) Head Start center-based teacher qualification requirements (ii) As prescribed in section 648A(a)(3)(8) of the Act a program must ensure all center-based teachers have at least an associate's or bachelor's degree in child development or early childhood education, equivalent coursework, or otherwise meet the requirements of section 648A(a)(3)(B) of the Act.</p>	Corrected

Focus Area Two – 4/23/2018 – Noncompliance (02CH010329, 02CH10048, 02HP0020)

The reviewers found that 7 out of 64 staff did not have the required qualifications as a lead teacher.

Grants 02CH10048 and 02CH010329 each had three teachers who did not meet the minimum qualifications. Grant 02HP0020 had one teacher who did not meet the minimum qualifications.

A review of the staff qualification tracking form found the Head Start teachers had a preschool Child Development Associate (CDA) credential, but according to the Program Director, staff was reluctant to continue their education beyond their CDA. The Early Head Start teacher for grant 02HP0020 had a high school diploma. Each staff person had a professional development plan; however, none indicated staff was enrolled in coursework to obtain the required qualifications.

The grantee did not ensure all Head Start and Early Head Start (EHS) center-based teachers had the minimum education qualifications and competency requirements; therefore, it was not in compliance with the regulation.

Desk/FTL Solo (2/6/2019) - Corrected

The grantee ensured all Head Start and Early Head Start (EHS) center-based teachers had the minimum education qualifications and competency requirements. The grantee partnered with local post-secondary institutions to enroll teachers in degree programs, secured a waiver for 33 teachers, strengthened monitoring and staff placement procedures, and provided training to new staff about qualifications.

The grantee partnered with local post-secondary institutions. In an interview, the Education Manager stated the grantee developed a Memorandum of Understanding (MOU) with Erie Community College. The college initiated cohorts that provided classes on site and provided tutoring support. A new cohort was scheduled to begin every 3 months. The grantee paid for books and tuition for the teachers. Currently, 26 teachers were enrolled in cohorts. The Director added the grantee also had a cohort with Buffalo State College. Six Head Start teachers were enrolled and would be graduating with bachelor degrees in the summer. A review of documents found the grantee had current MOUs with Erie Community College and Buffalo State College to provide staff with credentialing programs. A review of a list of 32 teachers found all were enrolled in degree programs. The Director stated one teacher was still awaiting approval from the post-secondary institution,

and one teacher's name was duplicated on the waiver and the approval, making the actual number of waivers applied for and approved 33, not 34.

The grantee strengthened monitoring of staff qualifications and tightened staff placement procedures. The Director stated Head Start was tracking staff qualifications; however, there were gaps in the system. The grantee's Human Resources (HR) took over tracking staff qualifications. Each month, HR staff met with the Education Manager to discuss teacher qualifications and progress on plans of study. Education Specialists followed up with staff to ensure they stayed on track to secure credentials. Education Service Area Reports were completed monthly and provided to the Education Manager.

The HR Manager stated that only candidates with required credentials were hired as lead teachers. Candidates without the required qualifications were recommended to Head Start as classroom assistants and enrolled in a Child Development Associates (CDA) program. HR used the Employment Qualification Worksheet to determine an applicant's qualifications for an interview and hire. HR also tracked the staff's progress on the CDA and notified Head Start when staff completed the program. At that point, they became eligible to be teachers. Teachers with a CDA were enrolled in a degree program, and HR tracked enrollment and progress. A review of September, October, and December 2018 Education Service Area Reports found they included the credentials held by each teacher. A review of a list of teachers with a CDA found each teacher was enrolled in a degree program. In addition, a review of the grantee's Qualifications Score Sheet found it monitored teacher candidate qualifications.

The grantee secured a waiver for 33 Head Start staff--one name was duplicated. The Director stated after the review they conducted an audit of staff credentials. The audit determined that more than seven staff did not meet education requirements. Staff that did not qualify were enrolled in credentialing and degree programs. A review of documents found the grantee applied for a waiver dated January 14, 2019, and it was approved by the Regional Office on February 5, 2019. Comparison of the list of teachers approved for a waiver with the list of teachers currently enrolled in degree programs found 33 of 34 teachers were enrolled in degree programs and 1 teacher was waiting for approval of her application to a degree program.

The grantee provided teacher qualifications training for new staff. The Director stated training for new staff was provided during a week-long new hire orientation with the Education Manager. In addition, the Education Manager provided training during the Education Orientation. A review of the Multi-Day Syllabus Template found it contained information about the CDA degree program completion requirements. Also, the Head Start Orientation-New Staff checklist included information about credentialing.

The grantee ensured all Head Start and EHS center-based teachers had the minimum education qualifications and competency requirements. This area of noncompliance is corrected.

— END OF REPORT —